

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	CASE NO. 4:23-CR-218-2
vs.	§	
	§	
(2) DHIRENKUMAR VISHNUBHAI PATEL,	§	
	§	
Defendant.	§	

JOINT MOTION TO CONTINUE SENTENCING HEARING
AND ALL RELATED DEADLINES

The United States of America and Defendant Dhirenkumar Vishnubhai Patel, through counsel, hereby jointly move the Court to continue the sentencing hearing of Mr. Patel and all related deadlines by sixty (60) days, and in support state:

On December 18, 2023, Mr. Patel entered a guilty plea to Count One of the Superseding Information, Conspiracy to Commit Mail Fraud in violation of 18 U.S.C. § 371. He is set for sentencing on April 1, 2024. The Initial Presentence Investigation Report was due on February 23, 2024. Docket Entry No. 53 (PSI Order).

As set forth in his Plea Agreement, Mr. Patel has agreed that certain assets seized by Homeland Security Investigations (HSI) at or around the time of his arrest will be returned to him through his attorney in this criminal case, liquidated as necessary, and turned over to the court clerk in anticipation of victim restitution. The parties are working expeditiously to complete this process with the agency, but the assets have not yet been returned to Mr. Patel through his attorney.

Additionally, this case involves a significant amount of discovery and material received regarding several victims. To ensure adequate time for preparation of the Initial Presentence Investigation Report, the parties propose that all dates in Mr. Patel's PSI Order be continued for sixty (60) days.

Respectfully Submitted,

ALAMDAR S. HAMDANI
United States Attorney
Southern District of Texas

By: /s/ Stephanie Bauman
Stephanie Bauman
Assistant United States Attorney

AGREED:

/s/ Sara Richey (by permission)
Sara Richey
Attorney for Dhirenkumar Vishnubhai Patel